

Nguyet Phan

05/30/2003 02:41 PM

To: NCIC HPV, moran.matthew@epa.gov

cc:

Subject: DBE Group Submission of Ecotoxicity Studies and Completion of Our HPV Program Obligation

Nguyet Phan  
ASRC Aerospace  
OPPT Docket  
EPA Docket Center

----- Forwarded by Nguyet Phan/DC/USEPA/US on 05/30/03 02:42 PM -----



Ed Kordoski <Kordoski@SOCMA.com> on 05/30/2003 12:09:05 PM

To: oppt.ncic@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA  
cc: Don Lederer <dalede@solutia.com>, Don Montgomery <dgmont@solutia.com>, Gerry Kennedy <gerald.l.kennedy@usa.dupont.com>, Kathy O-Keefe <Kathleen.E.O-Keefe@usa.dupont.com>, Kim Iverson <kimberly.a.iverson@usa.dupont.com>, Mark Wine <mark\_wine@dc.Kirkland.com>, "Leigh A. Belcher" <leigh.a.belcher@usa.dupont.com>, Len Lawton <llawton@aceto.com>, william.j.fasano@usa.dupont.com, Jessica Ross <Rossj@SOCMA.com>, George Semeniuk/DC/USEPA/US@EPA

Subject: DBE Group Submission of Ecotoxicity Studies and Completion of Our HPV Program Obligation

May 30, 2003

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
Post Office Box 1473  
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program; HPV Reference Number:

The Synthetic Organic Chemical Manufacturers Association's (SOCMA) Dibasic Esters (DBE) Group comprised of the following companies: Aceto Corporation, DuPont Textiles and Interiors (formally E.I. du Pont de Nemours and Company), and Solutia, Inc. submits copies of the ***Dimethyl Adipate Daphnia Toxicity Study*** and the ***Dimethyl Adipate Algae Toxicity Study*** that examined the ecotoxicity effects of Dimethyl Adipate (DMA, CAS # 627-93-0). These final studies were carried out by E. I. du Pont de Nemours and Company's Haskell Laboratory for Health and Environmental Sciences. The studies are being submitted in response to the EPA's comments and questions contained in a letter to the DBE Group from Mr. Oscar Hernandez, Director, Risk Assessment Division, dated September 4, 2002.

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Our letter to you dated November 8, 2002, contained the final edited HPV document composed of five individual documents: Justification of the Dibasic Esters (DBE) Category and Overview of DBE Robust Summaries; Robust Summaries for Dibasic Esters Solvents: Dimethyl Succinate DMS; Robust Summaries for Dibasic Esters Solvents: Dimethyl Glutamate DMG; Robust Summaries for Dibasic Esters Solvents: Dimethyl Adipate DMA; and Robust Summaries for Dibasic Esters Solvents: Dibasic Ester Mixture. In addition, although the DBE Group did not totally agree with EPA's scientific reasoning, we agree to carry out both *Daphnia* and *Algae* toxicity studies using DMA in 2003.

With the completion and submission of the *Daphnia* and *Algae* toxicity studies, the DBE Group has met its obligation in the EPA HPV Challenge Program.

Please contact me at (202) 721-4145 if there are any questions relating to this submission.

Sincerely,

Edward W. Kordoski, MBA, Ph.D.

Executive Director

cc: DBE Group

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Edward W. Kordoski, MBA, Ph.D.  
Synthetic Organic Chemical Manufacturers Association

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DBE DMA Daphnia Toxicity Study 5-23-2003.pdf



DBE DMA Green Algae Toxicity Study 5-22-2003.pdf